

CERTIFICATE OF SERVICE

DEBTOR 1 NAME: MARCO ANTONIO RAMOS
DEBTOR 2 NAME: LISA MARIE RAMOS

CASE NUMBER: 1740366

I Robert J Wallace, Jr. certify under penalty of perjury that I have served the attached document on the below listed entities in the manner shown on 7/25/2018 :

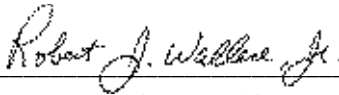
Via U.S. First Class Mail, or electronic service, if such interested party is an electronic filing user, pursuant to Local Rule 2002-1, Fed. R. Bankr. P. 2002 and other applicable law.

MARCO ANTONIO RAMOS, 1311 N VIKING DR, INDEPENDENCE MO 64056

By Electronic Transmittal :
By Fax :

I certify that I have prepared the Certificate of Service and that it is a true and correct copy to the best of my knowledge, information and belief.

Date : 7/25/2018

Signature : 

Premium Graphics, Inc.
2099 Thomas Road Suite 10
Memphis, TN 38134

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI**

**In re: MARCO ANTONIO RAMOS
LISA MARIE RAMOS**

Case No.: 17-40366-can-13

Debtors

MOTION TO DENY CONFIRMATION OF PLAN

COMES NOW Richard V. Fink, Chapter 13 Trustee, and requests the court deny confirmation of the proposed plan (document #45), filed on or about July 16, 2018. In support thereof, the trustee states that the issues related to the proposed plan include:

1. Treatment of Secured Creditors:

Debtors list creditor Chase Auto Finance in Part 3.2 of the plan and requests that court determine the value of the secured claim. The value of collateral is listed as \$12,000.00 and the amount of the secured claim is listed as \$12,061.00. It is the trustee's position that the "Value of Collateral" column and the "Amount of Secured Claim" column should match unless the claim is over secured or there is a senior lien. The trustee has loaded the claim to be paid to value in the amount of \$12,000.00. Please verify that the debtors are attempting to pay the claim to the value of \$12,000.00.

WHEREFORE, the Chapter 13 Trustee moves the Court for an Order Denying Confirmation of the proposed plan.

July 24, 2018

Respectfully submitted,

/s/ Richard V. Fink, Trustee

Richard V. Fink, Trustee
2345 Grand Blvd., Ste. 1200
Kansas City, MO 64108-2663
(816) 842-1031

NOTICE OF MOTION

Any response to the motion must be filed within twenty-one (21) days of the date of this notice (subject to an extension pursuant to Federal Rule of Bankruptcy Procedure 9006) with the Clerk of the United States Bankruptcy Court.

Documents can be filed electronically at <http://ecf.mowb.uscourts.gov>. A copy of such response shall be served electronically by the Court on the Chapter 13 Trustee and all other parties to the case who have registered for electronic filing. Parties not represented by an attorney may mail a response to the Court at the address below. If a response is timely filed, the Court will either rule the matter based on the pleadings, or set the matter for a hearing. If a hearing is to be held, notice of such hearing will be sent to all parties in interest. **If no response is filed within twenty-one (21) days (subject to an extension pursuant to Federal Rule of Bankruptcy Procedure 9006), the Court will enter an Order denying confirmation of the plan.** For information about electronic filing, go to <http://www.mow.uscourts.gov>. If you have any questions about this document, contact your attorney.

Court Address: U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106

NOTICE OF SERVICE

The following parties will be served either electronically or by United States First Class Mail and a certificate of service will be filed thereafter:

DEBTOR(S)

WAGONER BANKRUPTCY GROUP (206) - ATTORNEY FOR DEBTOR(S)

/s/ Richard V. Fink, Trustee

RI /Motion - Deny Confirmation